

EX PARTE OR LATE FILED

REED SMITH SHAW & McCLAY

1200 18TH STREET, N.W.

WASHINGTON, D.C. 20036

202-457-6100

FAX 202-457-6113

WRITER'S DIRECT DIAL NUMBER

(202) 457-8646

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December 14, 1994

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DEC 14 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: Notice of Ex Parte Contact
PR Docket No. 93-61

Dear Mr. Caton:

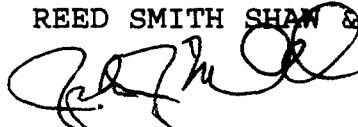
Pursuant to Section 1.1206 of the Commission's Rules, notice is hereby given of an ex parte communication regarding the above-referenced proceeding. The instant notice is being submitted in duplicate.

On December 14, 1994, Donald R. Gray, President of MobileVision, L.P., and I, as counsel to MobileVision, L.P., met with Ruth Milkman, Chief Legal Advisor to the Chairman, to discuss various matters relating to the issues in this proceeding. The attached materials, along with materials filed in an earlier ex parte notice, were left with Ms. Milkman.

Please associate this notice with the record in this proceeding.

Sincerely,

REED SMITH SHAW & McCLAY



John J. McDonnell

JJM/agw

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LMS Interim Rules, 1

❖ DEFINITION

- Voice and non-voice messaging [90.239(a), Report & Order para. 6,8,9]
- Interconnect [90.477]
- F3E emissions authorized [90.239(b)]

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MobileVision, 12/94



LMS Interim Rules, 2

❖ FREQUENCY ALLOCATIONS

- "Pulse Ranging Systems requiring 8 MHz" 904-912 MHz, 918-926 MHz.
 - ◆ Two 8 MHz systems (report & Order, para 10)
 - ◆ Two licensees per market (report & Order, para 10)
- Pinpoint & SBMS systems not designed to rules, have introduced problems to rule making proceeding.
- "AVM < 1 MHz, 903-904, 926-927 MHz" which leaves no clear provision for Amtech type systems.



LMS Interim Rules, 3

❖ TECHNICAL STANDARDS

- "Pending final development" [90.239(e)]
- "Commission may impose additional appropriate technical requirements" ...[90.239(e)(4)]
- 1 kW PEP...pulse ranging systems emissions on a case-by-case basis [90.239(e)(2)(i) and (iii)]
- Should reflect DSSS pulse ranging systems
 - ◆ mobile TX
 - ◆ fixed site TX
 - ◆ BW definition
- All changes better for Part 15

Positions

ISSUE	AGREE	DISAGREE
Exclusive Frequencies	MV, Teletrac, SBMS, (Uniplex?)	Pinpoint (time sharing over 16 MHz)
8 MHz	Teletrac, Pinpoint, MV, Uniplex	SBMS
Interconnect	Teletrac, MV, Uniplex, Pinpoint (data)	SBMS, Pinpoint (voice)
Technical Standards	Teletrac, MV, Uniplex, SBMS	Pinpoint (Power & DSSS link)